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### REMARKS

#### **I. Status Of The Application.**

Claims 1-7 and 19-23 were pending as of the date of the Office Action. In the Office Action, the Examiner:

- (a) Rejected claims 1-4 and 19-22 under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 4,152,624 to Knaebel ("Knaebel"); and
- (b) Rejected claims 5 and 23 under 35 U.S.C. §103(a) as allegedly being obvious over Knaebel in view of U.S. Patent No. 6,705,745 to Pederson ("Pederson").

The Applicants respectfully submit that the foregoing amendments to claim 1 and the following remarks overcome the Examiner's rejections of the Application.

#### **II. The Amended Claims Do Not Constitute New Matter.**

Applicants have amended claim 1 and respectfully submit that the amendments are supported by the specification as originally filed in Figures 1-6 and in the detailed description of the invention at pages 2-5. For these reasons, Applicants respectfully submit that amended claim 1 is supported by the specification as originally filed and that no new matter has been submitted by way of amendment. Accordingly, Applicants respectfully request that the amendment to claim 1 be accepted.

#### **III. The Rejection Of Claims 1-4 and 19-22 Under 35 U.S.C. §102(b) As Being Anticipated By Knaebel Should Be Withdrawn.**

Applicants respectfully submit that amended claims 1-4 and claims 19-22 are not anticipated by Knaebel Under 35 U.S.C. §102(b), because Knaebel does not disclose all the limitations of amended claims 1-4 and 19-22. Although not specifically mentioned in the Office

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Action, Applicants assume that dependent claims 6-7 were also rejected as being anticipated by Knaebel. A rejection under 102(b) can be overcome by showing that the prior art does not disclose all of the limitations of the claimed invention and/or by amending the claims to patentably distinguish over the prior art. MPEP §706.02(b).

Applicants respectfully submit that Knaebel does not disclose all the limitations of amended independent claim 1 and previously submitted independent claim 19. Knaebel discloses an indicator light assembly 11 that comprises a sleeve-like housing 15 with bottom and top openings 50 and 54 and four integrally joined walls 17, 19, 21, and 23 that enclose a cavity 35. (Col. 5, ll. 1-32). Electrodes 45 and 47 are inserted into the bottom opening 50 and positioned within cavity 35. (Col. 6, ll. 13-21). After the electrodes are inserted into cavity 35, an encapsulant 59 is used to fill in the cavity 35 of the housing 15. (Col. 6, ll. 64 - 67; Col. 10, ll. 11-52). Knaebel uses a lead frame to help position each of the electrodes on the lead frame into a separate housing 15 during manufacturing. (Col. 10, ll. 32-37).

Applicants respectfully submit that Knaebel does not disclose "a conductive lead frame insert molded so that the conductive lead frame is encapsulated in between the interior surface and the exterior surface of the housing," as claimed in claim 1. Knaebel's walls 17, 19, 21 and 23 of housing 15 each have exterior surfaces and interior surfaces. (Col. 10, ll. 11-52). In addition, Knaebel uses a lead frame 93 to facilitate the positioning of multiple sets of electrodes 45 and 47 into a separate housing. (Col. 10, ll. 11-52). Knaebel does not disclose that its lead frame 93 is "insert molded", so that its lead frame 93 "is encapsulated in between the interior surface and the exterior surface" of any of the walls housing 15. The lead frame 93 of Knaebel is not even part of the indicator assembly of Knaebel, because the lead frame is separated from the indicator once

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the encapsulant cures. (Col. 10, ll. 53-68). Rather, only the electrodes 45 and 47 are part of the indicator assembly of Knaebel. Moreover, electrodes 45 and 47 are not insert molded so that they are encapsulated in between the interior surface and exterior surface, but are instead positioned in the cavity of the already molded housing 15. (Col. 6, ll. 13-21; Col. 10, ll. 32-52). Accordingly, Applicants respectfully submit that amended claim 1 and claims 2-4 and 6-7, which depend therefrom, are not anticipated by Knaebel because nothing in Knaebel discloses "a conductive lead frame insert molded so that the conductive lead frame is encapsulated in between the interior surface and the exterior surface of the housing," as claimed in claim 1.

Moreover, Applicants respectfully submit that Knaebel does not disclose "[a] method for manufacturing a lamp assembly . . . comprising the steps of . . . inserting the conductive lead frame into a molding cavity . . . (and) molding a housing . . . around the lead frame in the molding cavity by injecting a plastic resin into the molding cavity, so that the conductive lead frame is encapsulated by the housing," as claimed in independent claim 19. As explained above, instead of having a housing molded around the lead frame so that the lead frame is encapsulated by the housing, the method of Knaebel places electrodes 45 and 47 within a cavity of a pre-molded housing 15, fills the cavity with an encapsulant and then separates the lead frame from the housing 15 (Col. 6, ll. 13-21; Col. 10, ll. 32-68). Accordingly, Applicants respectfully submit that claim 19 and claims 20-22, which depend therefrom, are not anticipated by Knaebel because Knaebel does not disclose the steps of "[a] method for manufacturing a lamp assembly . . . comprising the steps of . . . inserting the conductive lead frame into a molding cavity . . . (and) molding a housing . . . around the lead frame in the molding cavity

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by injecting a plastic resin into the molding cavity, so that the conductive lead frame is encapsulated by the housing."

Accordingly, Applicants respectfully submit that the rejection of claims 1-4, 6-7 and 19-22 under 35 U.S.C. §102(b) as being anticipated by Knaebel should be withdrawn because Knaebel does not disclose all the limitations of either independent claims 1 or 19.

**IV. The Rejections Of Claims 5 And 23 Under 35 U.S.C. §103(a) As Being Obvious Over Knaebel In View Of Pederson Should Be Withdrawn.**

Applicants respectfully submit that the rejections of claims 5 and 23 under 35 U.S.C. §103(a) should be withdrawn because neither Knaebel nor Pederson disclose, teach or suggest all the claim limitations of amended claim 1 from which claim 5 and 23 depend. Three criteria must be met to establish a *prima facie* case of obviousness: (i) there must be some suggestion or motivation to combine the teachings of two or more prior art references; (ii) there must be a reasonable expectation of success; and (iii) "all of the claim limitations must be taught or suggested by the prior art." MPEP §§ 2143 and 2143.03 (citing *In re Royka*, 490 F.2d 981 (C.C.P.A. 1974)). "If an independent claim is not obvious under 35 U.S.C. §103, then any claim depending therefrom is not obvious." MPEP § 2143.03 (citing *In re Fine*, 837 F.2d 1382, 1385 (C.C.P.A. 1970)).

As explained above, Knaebel does not disclose, teach or suggest "a conductive lead frame insert molded so that the conductive lead frame is encapsulated in between the interior surface and the exterior surface of the housing," as claimed in claim 1. Moreover, Pederson does not disclose, teach or suggest, nor does the Examiner assert that Pederson discloses, teaches, or suggests, "a conductive lead frame insert molded so that the conductive lead frame is

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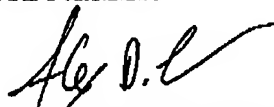
encapsulated in between the interior surface and the exterior surface of the housing," as claimed in claim 1. Accordingly, Applicants respectfully submit that the rejection of claims 5 and 23 under 35 U.S.C. §103(a) should be withdrawn because claims 5 and 23 depend from and incorporates all of the limitations of allowable independent claim 1.

### CONCLUSION

For all of the foregoing reasons, it is respectfully submitted that Applicants have made a patentable contribution to the art. Favorable reconsideration and allowance of this Application is therefore respectfully requested. In the event Applicants have inadvertently overlooked the need for payment of an additional fee, Applicants conditionally petition therefore, and authorize any deficiency to be charged to Deposit Account Number 09-0007. When doing so, please reference the above-listed docket number.

Respectfully submitted,

ICE MILLER



Alexander D. Forman, 51,691  
ICE MILLER  
One American Square, Box 82001  
Indianapolis, IN 46282-0002  
Telephone: (317) 236-5826  
Facsimile: (317) 592-5433

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Enclosures: Facsimile Cover Sheet  
RCE Transmittal